

REMARKS

Claims 6-31 are pending in the instant application. Claims 6-30 presently stand rejected. Claims 21 and 30 are amended herein. Claim 31 is newly presented. Entry of this amendment and reconsideration of the pending claims are respectfully requested.

Claim Rejections – 35 U.S.C. § 103

Claims 6-30 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Papa et al. (US 6,324,608 B1) in view of Eide et al. (US 6,529,978 B1). Applicants traverse the instance rejections.

“To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. All words in a claim must be considered in judging the patentability of that claim against the prior art.” M.P.E.P. § 2143.03.

Independent claim 6 recites, in pertinent part, “the communication link using **packetized messages based on a network transmission protocol** to provide communication **between the first processor and the first peripheral device.**” Applicants respectfully submit that the cited prior art fails to disclose communicating between a peripheral device and a processor, both disposed within a housing, using packetized messages based on a network transmission protocol.

The Examiner acknowledges that Papa fails to disclose using packetized messages to communicate between a processor and a peripheral device. *Office Action* mailed November 30, 2004, page 3. However, the Examiner cites Eide as teaching this element and relies on the portion of Eide which states,

an interface to a network 22 may be provided, e.g., to provide communications capability using any number of network protocols (e.g., IPX, TCP/IP, SNA, etc.).”

Eide, col. 5, lines 10-14. In the Response to Amendment section, the Examiner states, “Furthermore, at col. 8, lines 23-50, Eide discloses the bus manager IOA/IOP to take ownership via command to hardware driver. This implies packetized.” *Office Action* mailed November 30, 2004, page 9. However, the presence of BUS MANAGER 56 in

FIG. 3 of Eide actually implies that the system I/O bus is in fact a regular system bus—not a packetized message based communication link. Eide states,

A bus manager component 56 handles control of a system I/O bus component 58, which coordinates the **low level communications** within I/O interface 16.

Eide, col. 6, lines 58-61 (emphasis added). The fact that Eide discloses a software entity, namely BUS MANAGER 56, for coordinating low level communications within I/O interface 16 does not imply use of packets. In a packet based network, such as an Ethernet network, there is no centralized software entity coordinating communications between the entities coupled to the network. Rather, each entity simply encompasses data within a packet, attaches an address header, and sends the packetized message on its way to find its own destination. There is not a centralized software entity, like BUS MANAGER 56, coordinating low level communications.

Furthermore, within a computer using a system bus having a data bus and an address bus, a bus manager does coordinates access to the system bus. Packets simply have no meaning to a system bus. A system bus does not attach an address header to the data communicated across the data bus to designate the destination, but rather asserts lines of an address bus to designate a destination for data transmitted across the data bus. The existence of BUS MANAGER 56 in fact suggests that the system I/O bus of Eide does not use packets for communicating between any of IOPs 44 and system processor 12.

There simply is no mention of using packets within Eide, except for the one statement,

an interface to a network 22 may be provided, e.g., to provide communications capability using any number of network protocols (e.g., IPX, TCP/IP, SNA, etc.).”

Eide, col. 5, lines 10-14. However, this portion of Eide does not state that processor 12 communicates with I/O interface 16 or any of IOPs 44 using packetized messages. In fact, Eide clearly states that

External communication with apparatus 10 is handled through an input/output (I/O) interface 16 coupled to processing complex 11.

Eide, col. 4, lines 34-35 (Emphasis added). Thus, I/O interface 16 communicates with external network 22 using packets, but *Eide* does not disclose I/O interface 16 or IOPs 44 communicating with processor 12 using packets, as the claims recite. The Examiner has not pointed to any portion of *Eide* that discloses, teaches, or suggests that system I/O bus 18, any of IOPs 44, or IOAs 46 communicate with system processor 12 using packetized messages based on a network transmission protocol.

Consequently, the combination of *Papa* and *Eide* fails to teach or suggest all elements of claim 6, as required under M.P.E.P. § 2143.03. Independent claims 14 and 21 include similar nonobvious elements as independent claim 6. Accordingly, Applicants request that the instant §103(a) rejections of claims 6, 14, and 21 be withdrawn.

Dependent claims 7-13, 15-20, and 22-30 are nonobvious over the prior art of record for at least the same reasons as discussed above in connection with their respective independent claims, in addition to adding further limitations of their own. Accordingly, Applicants respectfully request that the instant § 103 rejections for claims 7-13, 15-20, and 22-30 be withdrawn.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants believe the applicable rejections have been overcome and all claims remaining in the application are presently in condition for allowance. Accordingly, favorable consideration and a Notice of Allowance are earnestly solicited. The Examiner is invited to telephone the undersigned representative at (206) 292-8600 if the Examiner believes that an interview might be useful for any reason.

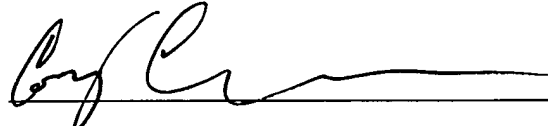
CHARGE DEPOSIT ACCOUNT

It is not believed that extensions of time are required beyond those that may otherwise be provided for in documents accompanying this paper. However, if additional extensions of time are necessary to prevent abandonment of this application, then such extensions of time are hereby petitioned under 37 C.F.R. § 1.136(a). Any fees required therefore are hereby authorized to be charged to Deposit Account No. 02-2666. Please credit any overpayment to the same deposit account.

Respectfully submitted,

BLAKELY SOKOLOFF TAYLOR & ZAFMAN LLP

Date: Feb. 22, 2005

A handwritten signature in black ink, appearing to read 'Cory G. Claassen', written over a horizontal line.

Cory G. Claassen

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